

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

IN RE TURQUOISE HILL RESOURCES LTD.
SECURITIES LITIGATION

Case No. 1:20-cv-08585-LJL

**STIPULATION AND [PROPOSED] ADDENDUM TO CASE MANAGEMENT PLAN
AND SCHEDULING ORDER**

WHEREAS, the Court scheduled an initial conference for this matter for January 23, 2023 at 10:00 am;

WHEREAS, a proposed case management plan is due to the Court on January 16, 2023;

WHEREAS, Lead Plaintiff the Pentwater Funds (“Pentwater”) and Defendants Rio Tinto plc, Rio Tinto Limited, Jean-Sébastien Jacques, and Arnaud Soirat (collectively, “Defendants” and together with Pentwater, the “Parties”) have conferred regarding certain deadlines for this case;

WHEREAS, the Parties have reached an agreement on certain case deadlines and are simultaneous filing the Court’s form case management plan and scheduling order, which embodies the parties’ agreement as to certain case deadlines;

WHEREAS, the Parties have also reached an agreement to certain additional deadlines that are not contained in the Court’s form case management plan and scheduling order, as well as numbers of interrogatories and depositions;

WHEREAS, the Parties wish for these additional agreed-upon deadlines and numbers of interrogatories and depositions to be so-ordered by the Court;

IT IS HEREBY STIPULATED AND AGREED, by the Parties, through their undersigned counsel, subject to the approval of the Court, as follows:


1. The following schedule shall govern proceedings in the Action:

Event	Deadline
Parties substantially complete document discovery	May 26, 2023
Plaintiffs file their motion for class certification including any expert report(s)	May 26, 2023
Defendants file their response or opposition to Plaintiffs' class certification motion including any expert report(s)	July 7, 2023
Plaintiffs file their reply in further support for class certification including any expert report(s)	August 4, 2023
Completion of fact discovery, including all fact depositions	March 29, 2024
Parties serve requests to admit	March 29, 2024
Deadline for the party(ies) with the burden of proof to serve expert report(s)	April 25, 2024
Deadline for party(ies) to submit any rebuttal expert report(s)	June 6, 2024
Completion of expert discovery, including all expert depositions	July 10, 2024
Parties shall file any motion(s) for summary judgment	August 2, 2024
Parties shall file any opposition(s) to summary judgment	October 1, 2024
Parties shall file any reply(ies) in support of summary judgment	November 15, 2024

2. These deadlines may be amended only by order of the Court, which may be sought by the Parties.
3. Each side may serve up to 35 interrogatories and take up to 30 depositions.
4. This Order may be modified for good cause shown on the motion of any Party.
5. The Parties agree to be bound by the terms of this Stipulation pending its entry by the Court.

Dated: January 13, 2023

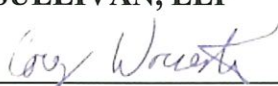
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and Arnaud Soirat*

IT IS SO ORDERED on this ____ day of _____, 2023.

Hon. Lewis J. Liman